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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF COLORADO

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DIVISION OF
OIL, GAS AND MINING

In re:)	
)	Case No. 01-23068-EEB
NORTH LILY MINING COMPANY, a Utah)	
corporation,)	Chapter 11
EIN: 87-0159350)	
)	Motion Control Number KMK-14
Debtor.)	
)	
)	Case No. 01-23069-DEC
)	
XERES TINTIC, LLC,)	Chapter 11
EIN: 84-1528808)	
)	Jointly Administered Under
Debtor.)	Case No. 23068-EEB

**DEBTORS' MOTION FOR THREE DAY EXTENSION OF TIME TO FILE
FIRST AMENDED JOINT DISCLOSURE STATEMENT TO ACCOMPANY
FIRST AMENDED PLAN OF REORGANIZATION DATED JANUARY 4, 2002**

The Debtors, North Lily Mining Company and Xeres Tintic, LLC, by and through their attorneys, Kutner Miller Kearns, P.C., hereby request a three day extension of time to file its First Amended Joint Disclosure Statement to Accompany First Amended Plan of Reorganization Dated January 4, 2002, and as grounds therefor state as follows:

1. The Debtors filed their Voluntary Petitions under Chapter 11 of the Bankruptcy Code on September 6, 2001.
2. On February 4, 2002, the Debtors filed their First Amended Plan of Reorganization dated January 4, 2002 and their Joint Disclosure Statement to Accompany First Amended Plan of Reorganization dated January 4, 2002.
3. On February 25, 2002, the Court issued an Order requiring the Debtors to file with the Court by April 1, 2002 a request for a hearing along with a statement that either the U.S. Trustee had no

objections to the Disclosure Statement, or that the Debtors have filed an amended Disclosure Statement resolving the U.S. Trustee's concerns.

4. On or about March 12, 2002, the United States Trustee filed its objection to the adequacy of the Debtors' Disclosure Statement.

5. The Debtors have been diligently working on amendments to the Disclosure Statement to address the U.S. Trustee's concerns. Counsel for the Debtors recently received a large amount of written information to incorporate into the amended Disclosure Statement. Due to the volume of information, counsel for the Debtors requests that this Court allow the Debtors an additional three (3) days to file its amended Disclosure Statement. The Debtors do not anticipate the need for additional extensions, and expect the amended Disclosure Statement to resolve the U.S. Trustee's concerns.

6. Allowing the Debtors an additional three (3) days to file its amended Disclosure Statement will not prejudice any creditor or party interest.

WHEREFORE, the Debtors pray that the Court enter an order allowing the Debtors an additional three days, up to and including April 4, 2002, to file its amended Disclosure Statement and its request for a hearing regarding the amended Disclosure Statement, and for such further and additional relief as to this Court appears proper.

Dated: April 1, 2002

Respectfully submitted,

By: 

Lee M. Kutner, #10966

Jenny M.F. Fujii #30091

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AFFIDAVIT OF SERVICE

I do hereby certify that on this 1st ^{one} day of March, 2002, I deposited a true and correct copy of the foregoing **DEBTORS' MOTION FOR THREE DAY EXTENSION OF TIME TO FILE FIRST AMENDED JOINT DISCLOSURE STATEMENT TO ACCOMPANY FIRST AMENDED PLAN OF REORGANIZATION DATED JANUARY 4, 2002** in the United States Mail, postage prepaid and addressed as follows:

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